

IN THE UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION

RAMONA MATTHEWS

PLAINTIFF

VERSUS

CIVIL ACTION FILE NO. 4:13-CV-00007-SA-JMV

PETER NWANKWO and
MISSISSIPPI VALLEY STATE
UNIVERSITY

DEFENDANTS

AFFIDAVIT OF RAMONA MATTHEWS

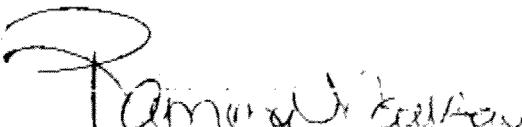
PERSONALLY CAME AND APPEARED BEFORE ME, the undersigned Ramona Matthews, who having been first duly sworn by me, states on oath a personal knowledge thereof, the following to-wit:

1. My name is Ramona Matthews, I was a student at Mississippi Valley State University (“MVSU”) for the spring semester of 2010.
2. At the time of my alleged harassment I was a student of Peter Nwankwo.
3. I filed a complaint with Mississippi Valley State University’s police department, personally and with the Leflore County sheriff’s department.
4. I never met with Jerrick L. Hornbeak regarding this entire situation, I never expressed any reluctance to Dr. Hornbeak regarding my going to the police department. I actually went to the police department and filed my complaint as I was told to do. I was very frustrated with the police departments failure to take action in this matter and felt like that by merely filing my complaint without any action being taken that I would be placed in a terrible position with Dr. Nwankwo.
5. After I was told that no action would be taken against Dr. Nwankwo, my class assignments were handled through Dr. Mukoro for the balance of the Spring 2010 semester; however, this was only three (3) weeks, and I was placed back in Dr.

Nwankwo's class for both the June and July summer school sessions at MVSU over my objections.

6. The statements regarding complaints of Martha Jefferson, Ramona Matthews, and Mary Leamon by Dr. Elizabeth Hurssey are incomplete and Dr. Nwankwo's request for a hearing indicated that we should have been told that he wanted a hearing because we were seeking the same thing and were never offered an opportunity for a hearing.
7. I met with Dr. Stevenson and Dr. Shingles and neither of these individuals are cited in MVSU's investigation or have given affidavits. Dr. Shingles told Martha Jordan and me that he knew that there were problems with Dr. Nwankwo.
8. In addition to Martha Jordan and Mary Lehman, another former student has come forward and agreed to testify about Dr. Nwankwo's conduct toward her in 2009, Isabella Jordan.
9. I do not even know who Frank Sorrell is and he was never a party to any conversations I have with any MVSU officials.
10. Dr. Nwankwo touched my buttocks and attempted to kiss me and I consider this highly offensive and suffered extensive mental anguish and emotional distress for which I received medical treatment as a result of his continuous acts, and I had to continue to take classes under him.

AND FURTHER, Affiant saith not.


RAMONA MATTHEWS

STATE OF MISSISSIPPI

COUNTY OF Choctaw

PERSONALLY appeared before me, the undersigned authority at law in and for said County and State, the within named Ramona Matthews, who after having first duly sworn on her oath, stated that the Affidavit of Ramona Matthews is true and correct as therein stated.

Ramona Matthews
RAMONA MATTHEWS

SWORN TO AND SUBSCRIBED before me this the 24th day of October, 2013.

Sherry L. Massie
NOTARY PUBLIC

My Commission Expires:

